

From: [Nierenberg, Kara \(she/her/hers\)](#)
To: eburt.hd@gmail.com
Cc: [Meeks, Sarah](#); [Purnell, Zanetta](#); twatson@hopedale-ma.gov; [Kyla Bennett](#)
Subject: RE: Hopedale Railyard - NMI contaminated soils
Date: Monday, February 27, 2023 1:33:00 PM

Hi Ed,

Thank you for your email. The news regarding the Ohio derailment is upsetting and I understand your concern. Fortunately, unlike the hazardous liquids and gases being transported by Norfolk Southern, the NMI soil that is moving through the GURR facility is not classified as a hazardous waste and is a dry solid matrix soil.

Transfers are continuing to improve and both bag breakage and spill numbers continue to decrease. Since the last update (1/24/23 to 2/24/23) US Ecology transferred 148 bags of soil (3,000 tons), had tears in 23 bags (16%) during the truck to rail transfer, and no spills (0%) outside of the gondola. Overall, the bag tear rate and spill rate have both decreased since the start of off-site soil transport. From our first report on 12/8/22 (after 118 bags transferred) until 2/24/23 (504 bags transferred total), the overall bag tear rate has decreased from 40% to 24% and the spill outside the gondola decreased from 16% to 7%. US Ecology and de maximis have worked with the bag manufacturers to further improve the bag designs and have been successful.

As we complete this first phase of work the excavation rate is slowing and we are limiting transports to GURR to maximize gondola filling and minimize wait times. The site team is transferring shipments in groups of 5 such that the gondolas can be filled within 1-2 days and then promptly transported off the GURR property. While we are aiming to finish transports at the end of this month, there is a chance we will continue with transfers up to 1 day per week for the foreseeable future as we advance our excavations. I will be in touch with you if we extend past the end of the month.

The site team will continue to evaluate the options for disposal of the remainder of the sitewide soils (approximately 77,000 CY of soil remain to be excavated and disposed of off-site).

Best,

Kara Kelly Nierenberg, PE
Massachusetts Superfund
617-918-1435

From: Ed Burt <eburt.hd@gmail.com>
Sent: Monday, February 20, 2023 9:34 AM
To: Nierenberg, Kara (she/her/hers) <Nierenberg.Kara@epa.gov>; Meeks, Sarah <Meeks.Sarah@epa.gov>; Purnell, Zanetta <Purnell.ZaNetta@epa.gov>
Cc: twatson@hopedale-ma.gov; Kyla Bennett <KBennett@peer.org>
Subject: Hopedale Railyard - NMI contaminated soils

Hi Kara,

I continue to receive comments and correspondence regarding the OH train derailment and the associated environmental disaster. All expressing concerns related to the Hopedale railyard and its activities within a Zone II Water protected area.

Common themes are distrust of all those involved, it could happen here and when it does, it will be too late. Regarding risks, train derailments, however common, are one matter, but intentionally bringing materials that are known to be dangerous to a water supply within a Zone II is clearly an avoidable risk.

I understand your desire to isolate the NMI project from other railyard concerns, especially the Fly-Ash issues that have been raised. But the fact remains that the increased activity at the Hopedale railyard due to the NMI project increases the overall risks at the railyard. Should something happen, slicing out a distinction over the individual activities at the railyard is meaningless to the water supply dangers. Why the EPA is willing to contribute to the Zone II concerns, rather than helping to address the environmental issues at the site, is the most common question.

The railyard requires a holistic approach to ensure water protection measures. While we have focused on the site itself, the condition of the tracks are a complete unknown.

Please understand that I believe that the ground protections, emergency procedures and oversight that we have requested since August 2022 will not be sufficient to mitigate the risks to the water supply. Nor will they satisfy the community's concerns, especially when the risk can easily be eliminated by simply keeping the materials out of the Zone II.

Preventing the materials from being in the Zone II is the solution. We encourage you to directly transport the NMI materials from Concord to the Michigan landfill, eliminating the train transloading altogether. Or find an alternative, appropriate (non Zone II) railyard, for the remainder of the NMI project.

Thank you,
Ed